



Maricopa County

Air Quality Department

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AIR QUALITY PERFORMANCE TEST NOTES & TIPS

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I. PERFORMANCE TEST QUESTIONS

1. What is a performance test?

A performance test; also known as a source test, stack test, or compliance test; is a physical measurement of the emissions from a control device or process equipment.

2. Why is testing required?

A performance test demonstrates that a control device or process equipment is properly installed and operated and in compliance with emission limits in permit conditions and applicable regulations.

3. Who needs to conduct a performance test?

Performance tests are required for a wide variety of industries and equipment. The most common equipment requiring testing includes scrubbers, catalytic or thermal oxidizers, baghouses, VOC abatement systems, boilers and flares. Permit conditions and applicable regulations will provide specific requirements for a facility.

4. How frequently must testing be conducted?

Non-Title V facilities are generally required to test equipment at least once during the lifetime of a permit which is generally five years. Testing shall occur within 60 days of permit issuance or initial start-up of the equipment but may be extended up to 180 days with approval. Please note that the 180 day deadline applies to compliance demonstration which includes test report submittal. Title V facilities generally require more frequent testing that could even occur on an annual basis. Permit conditions and applicable regulations will provide specific requirements for a facility. The Control Officer may require additional testing when considered necessary.

5. What pollutants are included in testing?

A wide variety of pollutants, most commonly particulate matter (PM), volatile organic compounds (VOC's), oxides of nitrogen (NO_x), carbon monoxide (CO) and acids such as hydrogen chloride (HCl) and hydrogen fluoride (HF), may be included in testing. The requirements vary depending on the process(es) involved. Specific requirements will be included in permit conditions and applicable federal regulations and county rules. The Control Officer may require testing of additional pollutants when considered necessary.

6. Where in our rules is testing discussed?

Rule 270 discusses testing generalities applicable to all tests such as when a test shall be conducted, operating conditions during testing, number of test runs, Department notification, etc. Industry- or pollutant-specific rules discuss testing details that include test requirements and applicable test methods.

7. What are the benefits of conducting a performance test?

Besides complying with applicable regulations and permit conditions, a performance test ensures a facility that the equipment is functioning properly. Test results may challenge the manufacturer's guarantee providing the opportunity for adjustments that may improve the equipment's operation and efficiency. For combustion devices such as catalytic or thermal oxidizers, boilers and flares, testing assures proper tuning of the device for efficient operation resulting in lower emissions and fuel usage. For facilities required to submit emissions inventory reports, test results are preferable to AP-42 emission factors which usually results in lower reported annual emissions.

8. Are performance test guidelines available?

The Department has prepared the Air Quality Performance Test Guidelines to assist with performance test execution and in the preparation of the test protocol and test report. The guidelines also include two newly created forms: the Performance Test Protocol Submittal Form and the Performance Test Report Submittal Form. Each form shall be completed and submitted with the applicable document. The guidelines and submittal forms are available on the Air Quality Webpage at www.maricopa.gov/aq/permits/policies.asp. The Air Quality Performance Test Notes & Tips document, which provides answers to common questions along with useful tips to assist in the performance testing process, is found at the same location.

9. How can a source find a legitimate test company?

The Department does not have a certification program for test companies nor can we make any recommendations for or against any test company. Any test company is allowed to conduct performance tests in Maricopa County. To provide assistance locating a test company, the Air Quality Performance Test Guidelines contain a list of the test companies that have performed testing in Maricopa County during the last few years.

10. Who can I contact with performance test questions?

Questions can be addressed to any member of the Technical Services Section:
Kathy Houed (602) 506-6903 Bill Baggenstoss (602) 506-6355
Rick Kelley (602) 506-6904 Joy Bell (602) 506-6622
Robert Arpino (602) 506-6737

II. THE PERFORMANCE TEST PROCESS

1. Identify the requirement for a test.

This information is available in permit conditions and applicable regulations.

2. Define objectives based on permit conditions and applicable regulations.

The objectives include determining what equipment requires testing, what operating conditions are necessary, what types of pollutants are to be sampled for and what results must be demonstrated such as emission rates and/or control efficiencies.

3. Contact test companies to obtain quotes.

Most facilities obtain at least two quotes unless they have previous experience with a reliable test company.

4. Select a test company.

The selection may be based on pricing, availability or additional services available.

5. Submit a separate test protocol for each piece of equipment to be tested to the Department at least 30 days prior to testing.

The test protocol is prepared by the test company and includes a detailed plan of action for the performance test that includes information on the facility, test company, test methods, emission points, control equipment, process equipment and quality control measures.

6. The Department will review the test protocol and issue a written response with comments and/or clarifications.

The test protocol is reviewed for completeness, accuracy and acceptability.

7. Notify the Department of the proposed test date at least two weeks prior to testing.

However, it is recommended that the test date be provided with the test protocol for scheduling purposes.

8. Conduct the performance test.

A Department observer is generally present to ensure that the test company is following proper procedures and methodology, to ensure that proper operation and documentation of the process and control equipment occurs and to evaluate the acceptability of the test.

9. Submit a test report to the Department within 30 days following the test.

The test report is prepared by the test company following sample analyses and calculation of results. The test report is submitted by the facility or directly by the test company, but the facility is the responsible party and must ensure that the test report is delivered to the Department.

10. The Department will review the test report and issue a written response with a compliance determination.

The test report is reviewed for completeness, accuracy and acceptability. Results are verified by performing all calculations and a compliance determination is made.

III. 12 TIPS FOR A SUCCESSFUL PERFORMANCE TEST

1. Read and follow the Air Quality Performance Test Guidelines.

The guidelines will familiarize the facility with the process and what is expected. The guidelines also inform the test company, particularly an out-of-state company, of the Department's requirements.

2. Conduct an on-site pre-test survey with the test company to determine test elements.

The survey will include items such as sample port locations or installation requirements, scaffolding or lift equipment requirements for stack access and electrical power requirements (common problem). This will eliminate surprises that may delay testing.

3. Submit a separate test protocol and test report for each piece of equipment to be tested.

Combining more than one piece of equipment in one test protocol or test report just leads to confusion.

4. Refrain from performing any non-scheduled maintenance or changes to the system for at least two weeks prior to the test. This is for system stabilization.

Last minute maintenance or changes to a system may cause operation problems that could interfere with testing. With some runtime on a system after maintenance, problems can be discovered and corrected prior to testing. Some examples of last-minute maintenance procedures that resulted in failed tests include:

- *Pressure spraying a scrubber and mist eliminator forcing water into the fan and pressure taps*
- *Replacing baghouse bags and having one come unseated*
- *Improperly replacing a thermal oxidizer burner cone causing a hot spot in the unit*
- *Replacing catalytic oxidizer catalyst and not having it seated properly*
- *Not allowing sufficient curing time of refractory work to an incinerator that collapsed during testing*

5. Verify in advance that all monitoring instrumentation is installed and working properly.

The morning of the test is no time to find out that instrumentation is missing or inoperable. This will delay testing until the instrumentation is installed and operating properly.

6. Confirm duct and stack accessibility in advance by removing caps from existing sample ports.

Port caps can become rusted on or seized requiring additional time and equipment for removal or installation of new ports. There was also an instance where an incinerator stack was lined with refractory after installation of the ports; testing was delayed until the port extension could be cut off and the refractory could be removed.

7. Review the facility's safety requirements and procedures.

Make sure that everyone knows of potential hazards associated with the facility and that appropriate safety precautions are followed.

8. Conduct a pre-test, if desired, to verify acceptable equipment operation.

Some facilities prefer to ensure proper tuning and/or operation of equipment prior to the performance test; however, this does increase the cost of the test program. If a Title V facility fails a test being conducted for their own benefit, the facility must report the failure and submit the relevant test data to the delegated agency pursuant to the reporting requirements of Title V.

9. Inform all affected personnel of the test schedule.

This will eliminate problems associated with maintenance and production schedules.

10. Coordinate testing with production.

Make sure that the process will be operating at the proper level and with the proper material to satisfy testing requirements. Also, make sure that the production schedule agrees with testing. If the process has any scheduled or unscheduled downtimes such as employee breaks, shift changes, product changes, malfunctions, etc., the test company needs to be notified immediately.

11. Determine who will record all necessary process and/or control equipment data.

This may be done by the facility or the test company depending on accessibility and manpower and needs to be determined prior to the start of the test.

12. Maintain contact between the facility and test team throughout testing.

The facility contact needs to be reachable to verify production, authorize changes that could affect equipment operation or emission limits and answer questions. The test company also needs to be notified immediately of any process malfunctions.

IV. FIVE TIPS FOR SELECTING A TEST COMPANY

1. Start the process early.

Testing typically requires a two- to three-month lead-time from determining the requirement for a test to actually conducting the test.

2. Know what you want from the test team.

Do you need consulting work in addition to performance testing?

3. Can the test company meet the timeframe requirement?

It doesn't matter what they have to offer if they can't meet your testing deadline.

4. Make sure that you are comparing equivalent bids.

Do the bids include the same components, such as:

- *Testing for the same pollutants*
- *Test runs that are of the same duration*
- *Generator services, if available power supply is limited (common problem)*
- *Scaffolding or lift equipment, if necessary*
- *A pre-test, if desired*
- *Consulting work, if desired*

5. Ask for references from satisfied clients.

Why did they choose one test company over another? Was the decision based solely on low bid, customer service or past experience (good or bad)?